

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>TYRONE HIPPS,</b>  <i>Plaintiff,</i>  vs.  <b>CUYAHOGA COUNTY, et al.</b>  <i>Defendants.</i>	Case No. 1:19-cv-02815  Judge Solomon Oliver, Jr.  Magistrate Judge David A. Ruiz
<b>PLAINTIFF TYRONE HIPPS'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO AMEND THE COMPLAINT WITHOUT LEAVE OF COURT</b>	

Plaintiff Tyrone Hipps respectfully moves the Court for 14 days' additional time to amend his complaint without leave of Court. The current deadline is today, May 15, 2020. The parties' counsel have conferred and the motion is unopposed.

Mr. Hipps's counsel only recently received long-pending, additional public-records video productions from Defendant County. Plaintiffs' counsel have faced technological, logistical, and time issues associated with obtaining, uploading, sharing, and analyzing the videos as counsel and paralegal staff work remotely because of the COVID-19 crisis. To ensure facts are pleaded in the amendment correctly and completely, particularly for the *Monell* claim, more time is needed for analysis, drafting, and editing.

No prejudice will result from the extension. While Mr. Hipps will probably have his amendment on file before 14 days elapse; this request is made out of an abundance of caution given the technological and communication challenges. The amendment will be filed well in advance of the June 25 scheduled mediation in this matter, so Defendants will plenty of time to absorb it before the mediation.

Dated: May 15, 2020

Respectfully submitted,

Tayeh Law Offices, LLC

/s/ Per consent

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<sup>1</sup> Ms. Savoie is admitted to practice in this Court. She is licensed to practice in Louisiana and certified to practice pending admission in Ohio. (Practice temporarily authorized pending admission under Gov. Bar R. I., Sec. 19. Ohio Attorney Registration No. 0099330.)